



**ONTONAGON COUNTY
TELEPHONE
COMPANY**

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February 3, 2006

VIA FCC ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Certification of CPNI Filing February 6, 2006; EB-06-TC-060

Ms. Dortch,

Enclosed for filing is a Certification of Compliance with Protection of Customer Proprietary Network Information Rules, which is being filed in accordance with the Commission's January 30, 2006 Public Notice, DA 06-223.

Sincerely,

James P. Brogan III
Chief Operating Officer & Secretary
Ontonagon County Telephone Company

cc: Byron McCoy, Telecommunications Consumers Division (via e-mail)
Best Copy and Printing, Inc. (via e-mail)
Dorothy Sharkey, V.P. - General Manager (via e-mail)

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

James P. Brogan III signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Ontonagon County Telephone Company (Company). This Certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR 64.2001-.2009.

On behalf of the Company, I certify as follows:

1. I am the Chief Operating Officer and Secretary of the Company. My business address is 108 West Superior Street, Munising Michigan 49862.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).

3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or the V.P. - General Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

6. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or the V.P. -

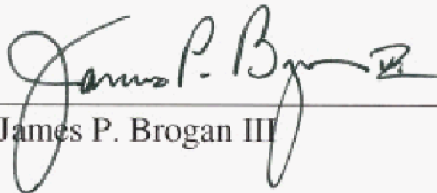
General Manager regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either I or the V.P. - General Manager consult the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either the V.P. - General Manager or I regarding any proposed use of CPNI.

8. Further, both the V.P. - General Manager and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.

9. The V.P. - General Manager and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

10. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

February 3, 2006:



James P. Brogan III